

Removing "the established business relationship" qualification from the fax regulations is bad for business. For our nonprofit membership association, we must now obtain the written consent of some 1000 members who already "opted in" by joining in the first place. Without their written consent, we cannot send them announcements of promotional opportunities or simple advertising renewal forms -- any item that can be construed as commercial in nature -- despite the fact that WMTA is a marketing association that businesses join for these very marketing opportunities.

When the new regulation goes into effect, our three-person sales and media/marketing staff, covering a half-state area, must repeatedly search the database to discover whether each member they wish to contact has signed a consent form. If not, their materials must be mailed by US Postal Service, putting us all back into the dark ages and moving at a snail's pace instead of at today's speed of light. Broadcast faxes are no longer possible, even though our members expect and welcome them.

WMTA is not alone. We count more than 70 convention and visitor bureaus, chambers of commerce and tourism councils among our membership. Each is faced with the same conundrum in communicating with their members as we are with ours.

Thank you for acknowledging my comments, made by resolution of the Legislative Affairs Committee of the West Michigan Tourist Association, on behalf of the association and its members.